

June 11, 2007

Rosa Lewis
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Identification Number: C00135368

Re: Amended Year End Report (11/28/06-12/31/06), received 2/23/07

To Ms. Lewis:

This letter is a response to the inquiry sent on April 27, 2007 requesting additional information on the following items:

a. Schedule E supporting line 24 has negative entries for the receipt of apparent refund/rebates that should be entered on Schedule A line 15 for refunds/rebates for operating expenditures.

In response to item (a), the negative entries are namely from 'Bybee, Mykel' and 'Grassroots Campaigns Inc.' The 'Bybee, Mykel' expenditure was not a refund/rebate, but a stop payment and reissue on supplies: food expense. The 'Grassroots Campaigns, Inc.' was a refund for an overpayment on an independent expenditure that was reported on the Post-General Report dated 11/2/2007. This is not an operating expense refund. Therefore, there will be no action taken concerning this item.

b. Verification of H3 transfers as being from non-federal accounts disclosed as 'GOTV doorhanger - PA', 'GOTV Mail WA', 'GOTV Staff - Seattle', and 'Sierra Club Voter Education Fund II'.

In response to item (b), listed in the inquiry are two different items. The GOTV entries are events entered into H2 allocation ratio. The 'Sierra Club Voter Education Fund II', 'Sierra Club Healthy Community Fund', and 'Pennsylvania SC Political Committee' are non-federal political organizations.

c. The combined H3 transfer(s)-in from a non-federal account(s) for 'the Administrative category' appears to exceed the non-federal share of the joint disbursement. The Commission recommends that we immediately transfer the total excessive amount back to the non-federal account.

In response to item (c): upon speaking with our FEC Reports Analyst, we learned that there was a system error on their FEC reports. The Sierra Club Political Committee did correctly reconcile and report the H3 transfers. The Analyst states no action is needed concerning this item.

d. Several items in Schedule E supporting Phil Kellam and opposing Richard Pombo are dated after the general election. It appears the date of dissemination was after the general election.

In response to item (d), refer to the following table that lists all of the Schedule E entries on the Year End Report:

	Original		
Report	Date of	Note	
Vendor	Date	Amount	Dissemination Reference

ETEXT ATTACHMENT

Bybee, Mykel 12/8/2006 (213.43) 11/3/2006 1
Bybee, Mykel 12/8/2006 (108.27) 11/3/2006 1
Bybee, Mykel 12/8/2006 213.43 11/3/2006 1
Bybee, Mykel 12/8/2006 108.27 11/3/2006 1
Gill, Mary 12/8/2006 37.82 9/27/2006 2
Grassroots
Campaigns Inc. 12/15/2006 (2,760.00) 11/2/2006 3
Bybee, Mykel 12/18/2006 14.63 11/1/2006 4
Blaemire
Communications 12/20/2006 1,062.22 10/27/2006 5
Malchow
Schlackman
Hoppey & Cooper, 12/20/2006 8,000.00 10/26/2006 5

1. These transactions for 'Bybee, Mykel' were to record the stop payment and reissue of the independent expenditure. A memo text was included in the report to reference the original date of dissemination. See item (a) for more information.
2. The expenditure was recorded at the payment date. Though the date of dissemination was in prior reporting periods, the amount is under \$500; therefore, the Sierra Club Political Committee will not amend the previous reports due to the expenditure being immaterial.
3. See item (a).
4. See explanation for note reference 2.
5. The Sierra Club Political Committee applies its best efforts to retrieve all invoices in a timely manner. However, these expenditures were recorded at the payment date since there was a distant lapse in recei